

☐ As the representative of _____, who is a living person.

☒ As the Personal Representative of Sally Roe (hereinafter "Decedent"), who died on 10-18-2012.

4. Additionally, Larry Roe, is

☒ Spouse

☐ Child/Children

☐ Other (Set forth) _____

of Sally Roe, is/are a resident(s) of the State of Michigan, and is/are hereby named as an additional plaintiff(s), and claims damages.

5. Plaintiff asserts that the Plaintiff was administered a New England Compounding Pharmacy, Inc. ("NECC") drug (hereinafter referred to as "NECC drug"), causing injuries and damages.

6. The aforesaid administration of the NECC drug occurred on: 9-18-2012, at time unknown, by Dr. John Chatas, at MI Pain Specialists, located in Brighton, Michigan.

7. Plaintiff(s) adopt(s) and incorporate(s) by reference the following Causes of Action asserted against the Defendants in the Master Complaint:

☒ COUNT II: NEGLIGENCE AND GROSS NEGLIGENCE (Against UniFirst)

☒ COUNT XIII: LOSS OF CONSORTIUM (Against UniFirst)

8. Plaintiff on behalf of Sally Roe claims to have suffered the following injuries as a result of the administration of NECC's drug: Fungal meningitis and death.

9. Plaintiff on behalf deceased claims to have suffered the following damages as a result of the administration of NECC's drug economic- noneconomic.

10. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer loss of consortium.

WHEREFORE, Plaintiff(s) demand(s) Judgment against the Defendant awarding compensatory damages, punitive damages, attorneys' fees, interest, costs of suit, and such further relief as the Court deems equitable and just.

Plaintiff(s) reserve the right to amend this Complaint to add allegations and claims against individuals or entities currently omitted (in light of the Court's order permitting a Master Complaint naming defendants affiliated with NECC and currently participating in mediation by December 20) and to add or amend allegations against Defendants named herein based, in part, on further discovery.

JURY DEMAND

Plaintiff(s) hereby demand(s) a jury trial.

Respectfully Submitted,

PLAINTIFF(S),

By (Their) Attorneys,

Terry A. Dawes

GEOFFREY N. FIEGER (P30441)

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